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United States of America
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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 GILBERT RAMIREZ and
MICHAEL VALENTINO LOVATO,
15 Defendants.
16

CASE NO. 2:23-CR-00016-TLN
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER
DATE: August 31, 2023
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

17
18 STIPULATION

- 19 1. By previous order, this matter was set for status on August 31, 2023.
- 20 2. By this stipulation, defendants now move to continue the status conference until October
21 12, 2023, at 9:30 a.m., and to exclude time between August 31, 2023, and October 12, 2023, under
22 Local Code T4.
- 23 3. The parties agree and stipulate, and request that the Court find the following:
 - 24 a) The government has represented that the discovery associated with this case
25 includes over 450 pages, including law enforcement reports, criminal history reports, and
26 recorded phone calls and text messages; which has been either produced directly to counsel
27 and/or made available for inspection and copying.
 - 28 b) Counsel for defendants desire additional time to consult with their clients, review

1 the discovery and the charges, prepare for trial, and investigate potential defense or mitigating
2 factors.

3 c) Counsel for defendants believe that failure to grant the above-requested
4 continuance would deny them the reasonable time necessary for effective preparation, taking into
5 account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of August 31, 2023 to October 12,
12 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis
14 of the Court's finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

19 IT IS SO STIPULATED.

20 Dated: August 22, 2023

PHILLIP A. TALBERT
United States Attorney

21 /s/ EMILY G. SAUVAGEAU
EMILY G. SAUVAGEAU
Assistant United States Attorney

22 Dated: August 22, 2023

23 /s/ Michael Hansen
Michael Hansen
Counsel for Defendant
GILBERT RAMIREZ

Dated: August 22, 2023

/s/ Chris Cosca

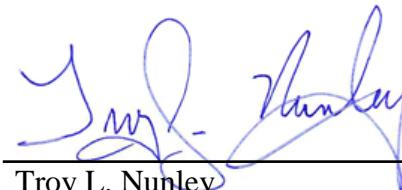
Chris Cosca

Counsel for Defendant

MICHAEL VALENTINO LOVATO

ORDER

IT IS SO FOUND AND ORDERED this 22nd day of August, 2023.



Troy L. Nunley
United States District Judge